

**REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed January 14, 2004. Applicants appreciate the Examiner's consideration of the Application. In the Office Action, the Examiner rejects Claims 1-34. In order to advance prosecution of this Application, Applicants have responded to each notation by the Examiner. Applicants respectfully request reconsideration and favorable action in this case.

**Section 102 Rejection**

The Examiner rejects Claims 1-3, 6, 10-11, 15-16, and 32 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 6,009,429 to Greer, et al. ("*Greer*"). Applicants respectfully traverse this rejection and any statements therein for the reasons discussed below.

Applicants respectfully submit that *Greer* fails to disclose the elements specifically recited in Applicants' claims. For example, *Greer* fails to disclose, teach, or suggest a "director operable to provide web browsing capabilities," as recited in Applicants' Claims 1, 6, and 15. According to the passage of *Greer* referenced by the Examiner, *Greer* merely discloses a guided tour of some portion of the web:

A guided tour of some portion of the World Wide Web (WWW) works as part of an ordinary web page, can be served by any web server, and can be used by web browsers without additional software. The system guides a user through a tour by displaying in sequence actual web pages in the tour along with a corresponding teaching web page. The teaching web page includes educational information about the current web page. The tour includes commentary, allowance for side trips, true visiting of the tour pages, not mere copies, maps, and "static" (user clicks for next page) and "dynamic" (a timer controls how long a tour page is on-screen) tours.

(*Greer*, Abstract). *Greer* specifies that the tour may work "as part of an ordinary web page," "can be served by any web server," and "can be used by web browsers." That is, the tour disclosed in *Greer* is directed to a director for a web server that provides pages to a web browser, but not a director for a web browser that retrieves pages from a web server. As a further example of this distinction, the tour disclosed in *Greer* is illustrated as being inset upon the Netscape Navigator layout (Figure 2). That is, the tour of *Greer* relies upon Netscape Navigator as a web browser director. Further, *Greer* provides that to start the tour "the user points his or her browser at 'http://www. . . . /Start. HTM', where ' . . . ' is the URL

address of the Web site desired." (Column 3, lines 39-41). "The starting HTML file contains all of the JavaScript routines, both of the arrays defining the tour, and all of the global variables." (Column 3, lines 41-43). That is, a web server needs to be accessed to initiate the tour. Consequently, at a minimum, *Greer* fails to disclose, teach, or suggest, a "director operable to provide web browsing capabilities," as recited in Applicants' Claims 1, 6, and 15.

For at least these reasons, *Greer* fails to disclose the elements specifically recited in Applicants' independent Claims 1, 6, and 15.

Applicants' dependent Claims 2, 3, 10, 11, 16, and 32 are allowable based on their dependence on the independent claims and further because they recite numerous additional patentable distinctions over the reference relied upon by the Examiner. Because Applicants believe they have amply demonstrated the allowability of the independent claims over the reference relied upon by the Examiner, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Applicants respectfully request reconsideration and allowance of independent Claims 1 and 6 and Claims 2, 3, 10, and 11 that depend on these claims.

The Examiner continues to reject Claim 31 under 35 U.S.C. § 102(e) as being unpatentable over U.S. Patent No. 6,587,873 to Nobakht et al. ("*Nobakht*"). Applicants traversed this rejection in the response filed on December 12, 2003. Although the Examiner has not responded to Applicants' arguments in this Office Action, Applicants believe that Applicants' previous arguments continue to have merit. Accordingly, Applicants respectfully traverse this rejection for the reasons discussed below.

Applicants respectfully submit that *Nobakht* fails to disclose the elements specifically recited in Applicants' claim. For example, *Nobakht* fails to disclose "an electronic mail module operable to communicate with the identifier module and communicate anonymous electronic mail between directors."

The passages relied on by the Examiner make reference only to electronic mail access. According to *Nobakht*:

In addition, network database 416 may store optional user home page information that allows each user convenient and secure access to e-mail, chat, and other Internet applications currently available to conventional network users.

(*Nobakht*, column 8, lines 41-45).

For example, as indicated in display 132 at the bottom of FIG. 4, user page information may include currently-received e-mail messages, stock portfolio information, and links to local news providers that are of particular interest to the user.

(*Nobakht*, column 9, lines 54-58). *Nobakht*, however, fails to disclose "an electronic mail module operable to communicate with the identifier module and communicate anonymous electronic mail between directors." Applicants respectfully point out that a sufficiently disclosed invention must be enabling. "[A] §102(b) reference must sufficiently describe the claimed invention to have placed the public in possession of it.... [E]ven if the claimed invention is disclosed in a printed publication, that disclosure will not suffice as prior art if it was not enabling...." *Paperless Accounting, Inc. v. Bay Area Rapid Transit Systems*, 804 F.2d 659, 665, 231 USPQ 649, 653 (Fed. Cir. 1986). For at least these reasons, *Nobakht* fails to disclose the elements specifically recited in Applicants' independent Claim 31. Applicants respectfully request reconsideration and allowance of independent Claim 31.

### **Section 103(a) Rejection**

The Examiner rejects under 35 U.S.C. § 103(a): Claims 4 and 17-18 as being unpatentable over *Greer* in view of *Nobakht*; Claims 5, 25-30, and 34 as being unpatentable over *Greer*; and Claims 7-9, 12-14, 19-24, and 33 as being unpatentable over *Greer* in view of U.S. Patent No. 6,208,001 to Walker et al. ("*Walker*"). Applicants respectfully traverse this rejection and any assertions therein for the reasons discussed below.

Applicants respectfully submit that the specific combinations of references as suggested by the Examiner fails to disclose, teach, or suggest elements specifically recited in Applicants' claims. For at least the reasons presented above, *Greer*, even in combination with *Walker*, fails to disclose, teach, or suggest, a "director operable to provide web browsing capabilities," as recited in Applicants' Claims 12 and 25. As discussed above, *Greer* is directed to a director for a web server that provides pages, but not a director for a web browser that receives pages. Thus, *Greer* cannot be said to disclose, teach, or suggest a "director operable to provide web browsing capabilities," as recited in Applicants' Claims 12 and 25.

Applicants' dependent Claims 4, 5, 7-9, 13, 14, 17-24, 26-30, and 33 are allowable based on their dependence on the independent claims and further because they recite numerous additional patentable distinctions over the combinations of references suggested by the Examiner. Because Applicants believe they have amply demonstrated the allowability of the independent claims over the combinations of references suggested by the Examiner, and to avoid burdening the record, Applicants have not provided detailed remarks concerning these dependent claims. Applicants, however, remain ready to provide such remarks if it becomes appropriate to do so.

Applicants respectfully request reconsideration and allowance of independent Claim 12 and 25 and all claims that depend on these claims.

**CONCLUSION**

Applicants have made an earnest attempt to place this case in condition for allowance. For at least the foregoing reasons, Applicants respectfully request full allowance of all the pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Keiko Ichiye, the Attorney for Applicants, at the Examiner's convenience at (214) 953-6494.

Although no fees are believed due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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